

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Ralph R. Nelson

Plaintiff

v.

Tonya Marie Coffey (Nelson), et al.

Defendants


2004 JUN 18 12 15 PM
U.S. DISTRICT COURT
CASE NO. 04-10845-CAO
DISTRICT OF MASS.

**MOTION FOR EXTENSION OF TIME TO MOVE OR OTHERWISE PLEAD FOR
DEFENDANTS CARLA TOWNSEND, ROBERT SUVER, VIRGINIA BROWN,
SANDRA MENDENHALL, DEBBIE MARTINEAU, HOLLY PAYNE,
AND JOEL SALWAY**

The above defendants move for an extension of time to move or otherwise plead for 30 days pursuant to Federal Rule of Civil Procedure 12.

Additional support is contained in the Memorandum attached hereto.

Respectfully submitted,



Mark Landes (0027227)
Isaac, Brant, Ledman & Teetor, LLP
250 East Broad Street, Suite 900
Columbus, OH 43215
614-221-212 (Telephone)
(614-365-9526 (Facsimile)

MEMORANDUM

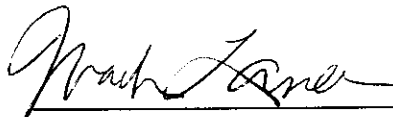
Pro se plaintiff complains in a 300 paragraph complaint against several Clark County officials. The gravamen of his complaint concerns his child support.

The undersigned counsel has just received the complaint and the direction to defend these county officials.

Given the complexity and density of the complaint and the multiple defenses that should be pled, along with the anticipated Motion to Change Venue, we ask the court's forbearance in receiving this Motion to Extend.

We will promptly file a Motion for Admission Pro Hac Vice for the limited purpose of moving to change venue.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Mark Landes", is written over a horizontal line.

Mark Landes (0027227)
Isaac, Brant, Ledman & Teetor, LLP
250 East Broad Street, Suite 900
Columbus, OH 43215
614-221-212 (Telephone)
(614-365-9526 (Facsimile)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was mailed by ordinary

U.S. mail, postage prepaid, to the undersigned, this 1st day of June, 2004:

Ralph R. Nelson
57 Charter Street, Apt. 2A
Boston, MA 02113

Tonya Marie Coffey
3316 Bristol Drive
Springfield, OH 45503

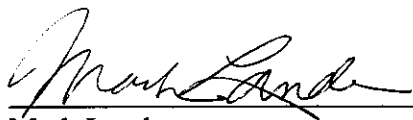
Sherri Z. Heller
Commissioner of the Federal Office of
Child Support Enforcement
The U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Dannetta Graves, Director
14 West Fourth Street
Dayton, OH 45422

China L. Widener, Assistant Director
Ohio Department of Job and Family Services
30 E. Broad St., 32nd Floor
Columbus, Ohio 43215-3414

Tom Hayes, Director
Ohio Department of Job and Family Services
30 E. Broad St., 32nd Floor
Columbus, Ohio 43215-3414

Marilyn Ray Smith
Deputy Commissioner of Child Support
The Commonwealth of Massachusetts
Department of Revenue
Child Support Enforcement Division
PO Box 7010
Boston, MA 02204


Mark Landes